



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

*271 Cadman Plaza East
Brooklyn, New York 11201*

May 17, 2023

By ECF

Honorable Peggy Kuo
United States Magistrate Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Scott, et al. v. United States*, 19-cv-1075 (ERK) (PK)

Dear Judge Kuo:

This Office represents defendant United States of America in the above-referenced matter. Defendant writes on behalf of all parties, and pursuant to the Court's Order of April 19, 2023 to provide a joint status report informing the Court of the progress since the parties last updated the Court on April 17, 2023, *see* Dkt. No. 206, and to request a 16-day stay of discovery until June 2, 2023, to allow the parties to engage in further negotiations.

The parties continue to make substantial progress toward reaching a potential settlement agreement. Since our last update on April 17, 2023, the parties have conferred further regarding the proposed settlement; to wit, on April 26, Plaintiffs provided a comprehensive written response to Defendants' April 13 counter-proposal, and on May 11, the parties participated in a lengthy telephone conference. The requested brief extension of all discovery deadlines will allow the parties to further negotiate all outstanding terms, in the hopes of reaching a final resolution in the near future.

Accordingly, the parties respectfully request that the Court stay discovery until June 2, 2023, to allow the parties to further negotiate the terms of their potential settlement agreement. We propose providing a joint status update to the Court on June 2, 2023.

* * *

We thank the Court for its consideration of this matter.

Respectfully submitted,

BREON PEACE
United States Attorney

By: /s/ electronically signed
Sean P. Greene-Delgado
Shana C. Priore
Paulina A. Stamatelos
Philip R. DePaul
Assistant U.S. Attorneys
(718) 254-6484/6188/6198/7503
sean.greene@usdoj.gov
shana.c.priore@usdoj.gov
pauline.stamatelos@usdoj.gov
philip.depaul@usdoj.gov

cc: All counsel of record (by ECF)